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September 30, 2005

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte* Notice of ViaSat, Inc.; IB Docket No. 05-20

Dear Ms. Dortch:

On September 29, 2005, Keven Lippert and Daryl Hunter of ViaSat, Inc., and John Janka and I of Latham & Watkins LLP, met with Karl Kensinger, Scott Kotler, Artie Lechtman, Bob Nelson, Frank Peace, and Shabnam Javid, to discuss ViaSat's comments submitted in IB Docket No. 05-20 regarding the proposed service rules for Aeronautical Mobile Satellite Service ("AMSS").

Attached hereto are the presentation slides relating to our discussion of issues in the AMSS proceeding. Please contact the undersigned if you have any questions regarding this submission.

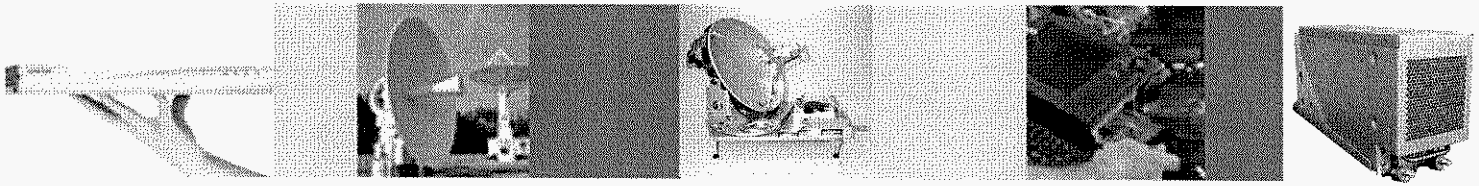
Respectfully submitted,

Elizabeth R. Park

Attachment

cc: Shabnam Javid
Karl Kensinger
Scott Kotler
Artie Lechtman
Bob Nelson
Frank Peace

FCC Presentation

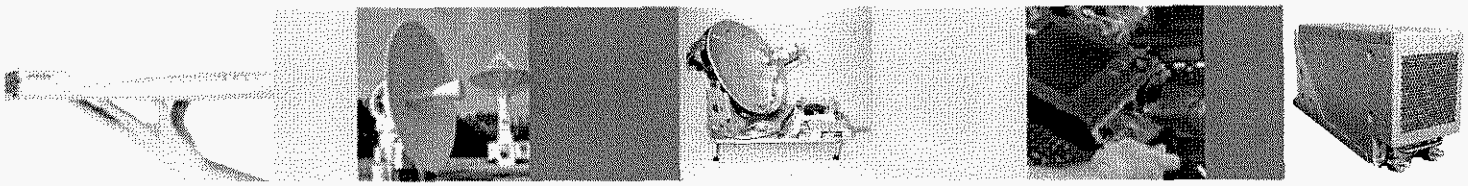


ViaSat

September 29, 2005

Key AMSS NPRM Comments

- Off-axis EIRP Density Mask
- Contention Exceedance Table
- Aggregate Network Power Density Limit
- Antenna Pointing Accuracy
- NGSO Systems



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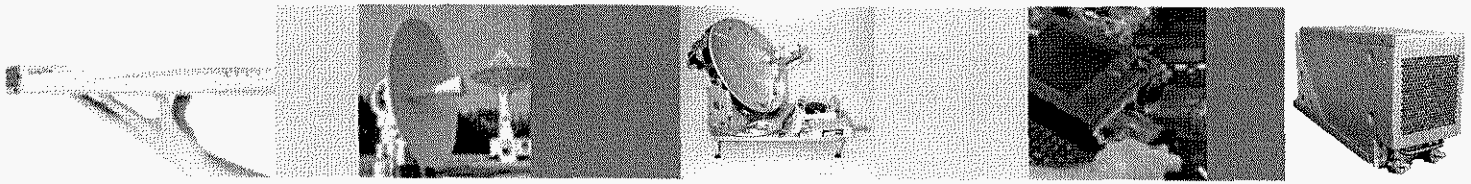
Off-Axis EIRP Density Mask

- A significant enabler for compact mobile satellite terminals
- Gives industry incentive to develop innovative waveforms and other solutions to lower power spectral density
- Spread Spectrum a proven technology for lowering PSD levels



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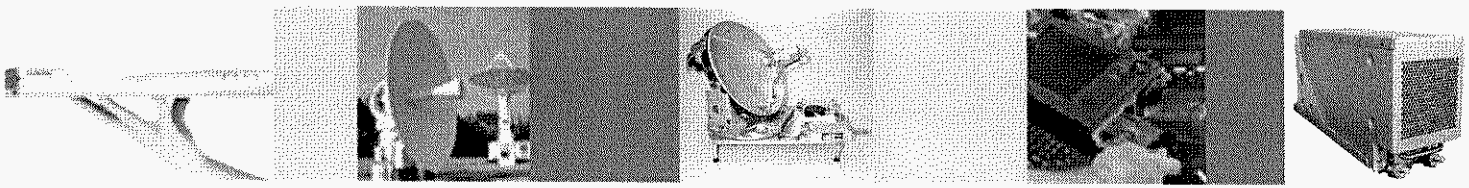
Contention Exceedance Table

- **Reduces cost to the consumer**
  - More customers can be supported per leased resource
  - Allows more effective sharing of network resources so network operators can more efficiently support return channel traffic
  - Transient effects such as power control error and antenna pointing error can be modeled, monitored, and controlled to live within the exceedance table



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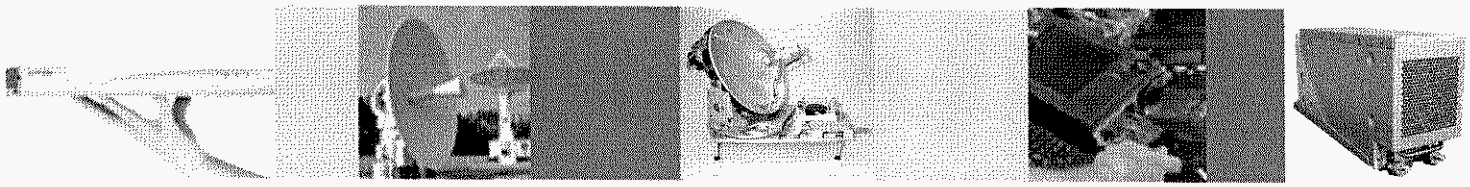
Aggregate Network PSD Limit

- **Aggregate Network PSD Limit**
  - Supports sharing of satellite resources
  - Advantaged AES terminals use less satellite resources that can be shared with disadvantaged AES terminals
  - Different aircraft bodies require different antenna solutions – some have better off-axis performance than others
  - Flexibility to mix data rates across terminals



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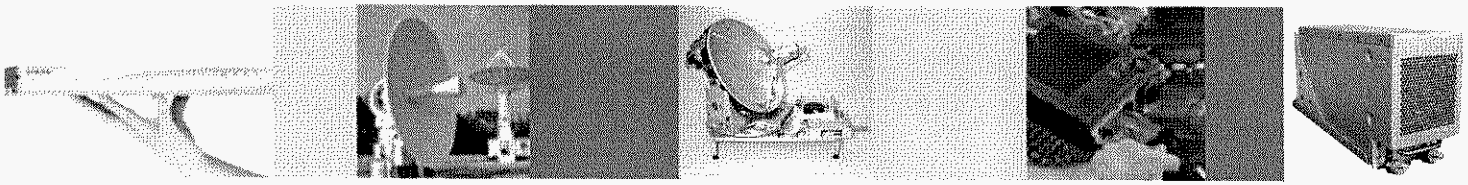
Antenna Pointing Accuracy

- **Significant cost driver**
  - Proposed accuracy requirement requires very expensive inertial navigation systems
    - Often also have export restrictions
  - Pointing accuracy less of a concern for networks of low PSD terminals – single terminals themselves transmit at PSD levels well below the interference threshold
  - Antenna pointing accuracy effects should be included in the network aggregate off-axis EIRP density budget



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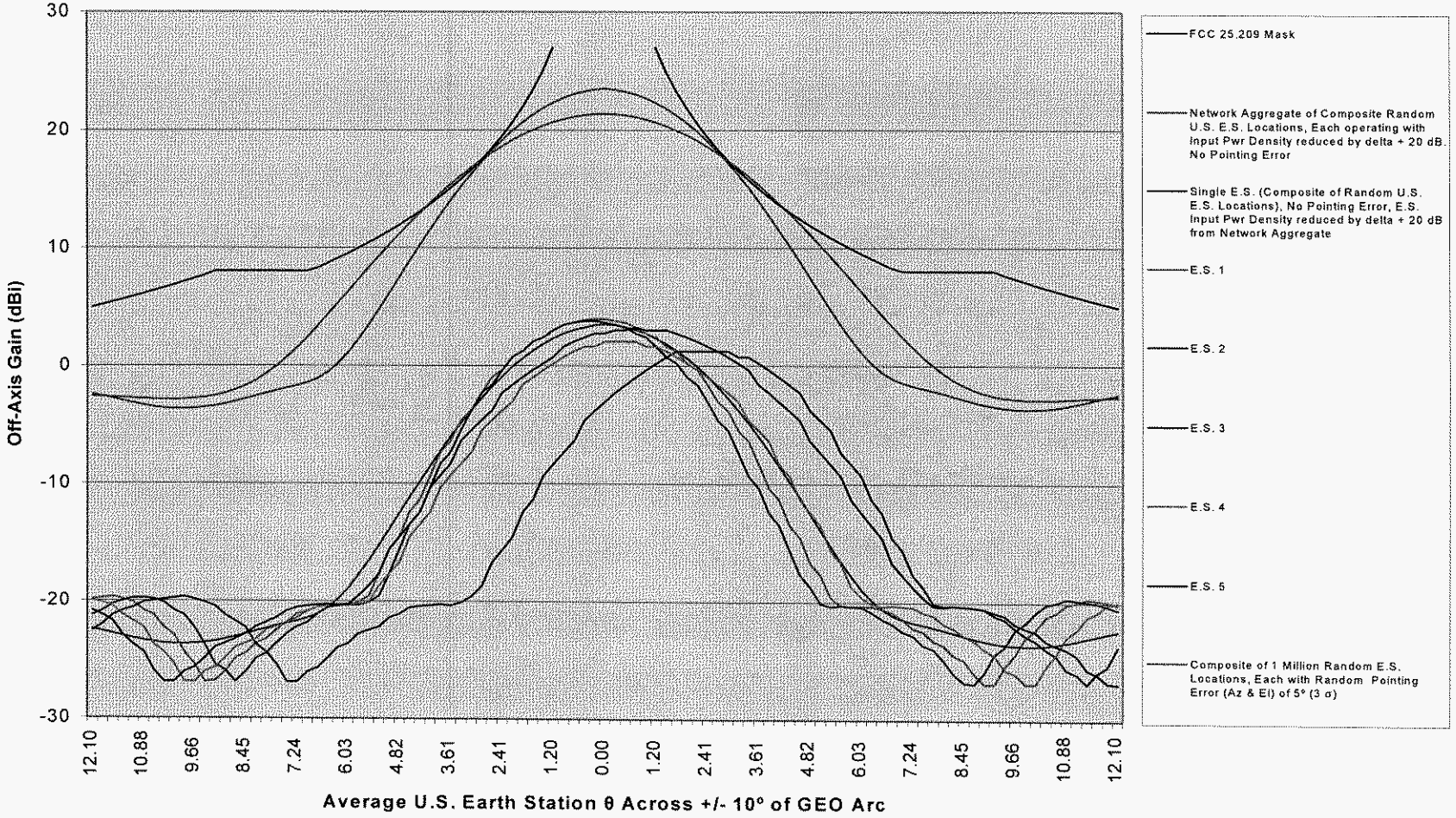
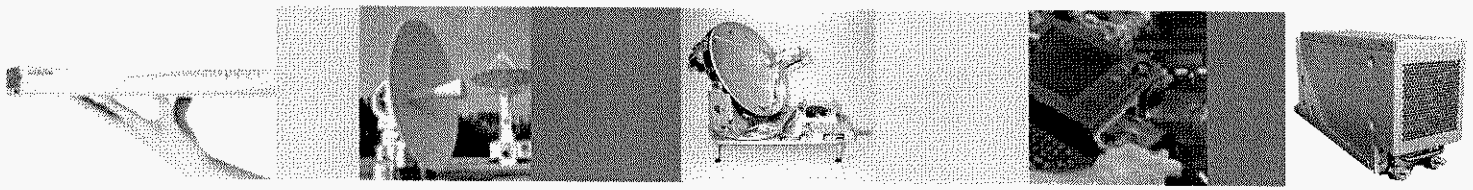
Antenna Mispointing Example





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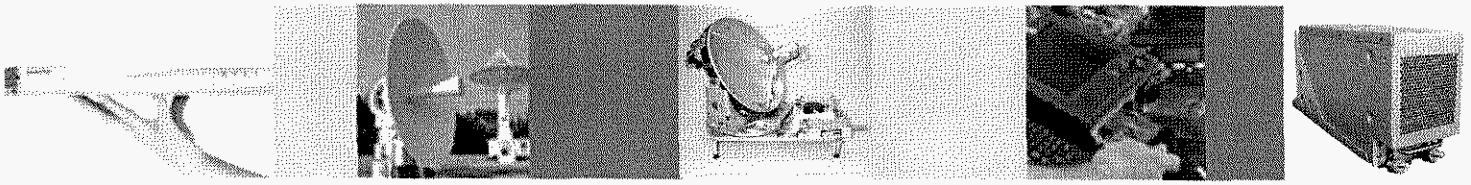
NGSO Systems

- **Current protection of angles outside the GEO arc is a significant limiting factor in the use of low profile antennas for mobile broadband applications**
  - Low profile antennas typically have wider antenna beams in the elevation plane
- **Skybridge has declined FCC grant of launch authorization**
- **No other NGSOs on the horizon**



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